

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

ROBIN FORSLUND, TIMOTHY KELLY,
GEORGE LENZ JR., MATTHEW
MENTING, DONALYN NORTH, ROBIN
RECTOR, ERIC OTTENHEIMER, GAIL
ROSSI, and GREGORY WILLIAMS,

*on behalf of themselves and all others
similarly situated,*

Plaintiffs,

v.

R. R. DONNELLEY & SONS
COMPANY,

Defendant.

Case No. 1:22-cv-04260

JUDGE JOHN J. THARP, JR

**PLAINTIFFS' UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Pursuant to Federal Rule of Civil Procedure 23(e), Plaintiffs Robin Forslund, Timothy Kelly, George Lenz Jr., Matthew Menting, Donalyn North, Robin Rector, Eric Ottenheimer, Gail Rossi, and Gregory Williams (the “Plaintiffs”) move for the entry of the Proposed Preliminary Approval Order submitted herewith, which seeks the preliminary approval of a proposed class action settlement (the “Settlement”), certification of a proposed settlement class (the “Settlement Class”), and approval of a notice plan, as explained herein and in the supporting documents.

1. Plaintiffs respectfully request that the Court: (1) conditionally certify the Settlement Class for settlement purposes; (2) name Plaintiffs as Class Representatives; (3) appoint Raina C. Borrelli of Turke & Straus, LLP, Joseph M. Lyon of The Lyon Firm, LLC, and Gary M. Klinger

of Milberg Coleman Bryson Phillips Grossman, PLLC as Class Counsel; (4) grant preliminary approval of the Settlement; (5) approve the proposed Notice and direct its distribution to Settlement Class Members; (6) set deadlines for Settlement Class Members to object or opt out; and (7) schedule a final approval hearing, at which time the Court can consider whether to give final approval to the Settlement.

2. This Motion is based upon: (1) this Motion; (2) the Memorandum of Law in Support of Plaintiffs' Unopposed Motion for Preliminary Approval; (3) Class Counsel's Declaration; (4) the Settlement Agreement; (5) the Parties' proposed Notice program; (6) the [Proposed] Preliminary Approval Order; (7) the records, pleadings, and papers filed in this Action; and (8) upon such other documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing of this Motion.

3. Defendant does not oppose the relief requested in this motion.

WHEREFORE, Plaintiffs request that the Court enter the proposed Preliminary Approval Order.

Dated: July 28, 2023

Respectfully submitted,

/s/ Gary M. Klinger

Gary M. Klinger

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was filed and served via the Court's electronic case filing system on July 28, 2023, on all counsel of record.

/s/ Gary M. Klinger
Gary M. Klinger